IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

UNITED STATES OF AMERICA, ex rel. ALEX DOE, Relator

THE STATE OF TEXAS, ex rel. ALEX DOE, Relator

THE STATE OF LOUISIANA, ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION § OF AMERICA, INC.,
PLANNED PARENTHOOD GULF COAST, INC.,
PLANNED PARENTHOOD OF GREATER § TEXAS, INC.,
PLANNED PARENTHOOD SOUTH TEXAS, § INC.,
PLANNED PARENTHOOD CAMERON § COUNTY, INC.,
PLANNED PARENTHOOD SAN ANTONIO, § INC.,

Defendants.

No. 2:21-cv-022-Z

Date: December 21, 2022

APPENDIX D IN SUPPORT OF PLANNED PARENTHOOD FEDERATION OF AMERICA, INC.'S MEMORANDUM OF LAW IN SUPPORT OF ITS OPPOSITION TO TEXAS'S MOTION TO COMPEL

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APPENDIX D

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Priv Log #	Date	Author	Recipient(s)	Privilege Type	Privilege Description
PRIV-002291	5/7/2018	Hart, Kelly	Gottlieb, Kathryn*; White, Kasia; Limon- Mercado, Dyana; Gutierrez, Yvonne; Wiens- Talbert, Angie; Posada, Mara; Flaxman, Carrie*; Flood, Kristin*; Watson, Beth; Nguyen, Tram	Attorney Client Privilege	Confidential email providing legal advice from in- house counsel Kathryn Gottlieb, Esq., Carrie Flaxman, Esq., and Kristin Flood, Esq., regarding state regulatory compliance strategy.
PRIV-002315	4/21/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada; Limon- Mercado, Dyana; Wiens- Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002324	4/7/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from inhouse counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002325	4/7/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002326	4/3/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Shelia; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002327	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Shella; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002328	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Shella; Limon- Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002329	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from inhouse counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of

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PRIV-002330	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons,	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-
002350		,	Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-	, 100, 1 1000	house counsel Jennifer Sandman, Esq., regarding litigation strategy and prepared in anticipation of

			Mercado, Dyana; Wiens- Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*		
			naman		
PRIV-002331	3/30/2020	McKinney, Sheila	Sandman, Jennifer*; Lambrecht, Ken; Linton,	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-
			Melaney; Hons, Jeffrey; Wheat, Sarah;		house counsel Jennifer Sandman, Esq. regarding
			Barraza, Polin*; Posada, Mara; Limon-		litigation strategy and prepared in anticipation of
			Mercado, Dyana; Wiens-Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Murray, Julie*; Swanson,		
PRIV-002332	3/30/2020	Wheat, Sarah	Hannah* Sandman, Jennifer*; Lambrecht, Ken; Linton,	Attorney Client Privilege: Work Product	Confidential email providing legal advice from in-
	,,,,,	,	Melaney; Hons, Jeffrey; Barraza, Polin*;	1,000	house counsel Jennifer Sandman, Esq. regarding
			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
I			Mercado, Dyana; Wiens-Talbert, Angie;		litigation.
l			Gottlieb, Kathryn*; Murray, Julie*; Swanson,		
			Hannah*		
PRIV-002333	3/29/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons,	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-
	-, -, -		Jeffrey; Wheat, Sarah; Barraza, Polin*;		house counsel Jennifer Sandman, Esq. regarding
			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
			Mercado, Dyana; Wiens- Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Murray, Julie*; Swanson,		
			Hannah*		
PRIV-002334	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons,	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-
			Jeffrey; Wheat, Sarah; Barraza, Polin*;		house counsel Jennifer Sandman, Esq. regarding
			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
			Mercado, Dyana; Wiens- Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Clapman, Alice*; Muniz,		
			Richard*; Murray, Julie*; Swanson, Hannah*		
PRIV-002335	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons,	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-
			Jeffrey; Wheat, Sarah; Barraza, Polin*;		house counsel Jennifer Sandman, Esq. regarding
			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
			Mercado, Dyana; Wiens- Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*		
PRIV-002336	3/26/2020	Sandman Jonnifor*		Attornoy Client Brivilage, Work Brediest	Confidential amail providing logal advice from in
FNIV-UU2330	3/20/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*;	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in- house counsel Jennifer Sandman, Esq. regarding
			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
			Mercado, Dyana; Wiens- Talbert, Angie;		litigation.
			Gottlieb, Kathryn*; Clapman, Alice*; Muniz,		
			Richard*; Murray, Julie*; Swanson, Hannah*		
PRIV-002337	3/26/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton,	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-
7.10-002337	-,,	,,	Melaney; Hons, Jeffrey; Wheat, Sarah;	,	house counsel Jennifer Sandman, Esq. regarding
			Barraza, Polin*; Posada, Mara; McKinney,		litigation strategy and prepared in anticipation of
			Sheila; Limon- Mercado, Dyana; Wiens-		litigation.
			Talbert, Angie; Clapman, Alice*; Muniz,		
			Richard*; Murray, Julie*		
	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons,	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-
PRIV-002338		i	Jeffrey; Wheat, Sarah; Barraza, Polin*;		house counsel Jennifer Sandman, Esq. regarding
PRIV-002338					
PRIV-002338			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of
PRIV-002338			Posada, Mara; McKinney, Sheila; Limon- Mercado, Dyana; Wiens- Talbert, Angie;		
PRIV-002338			Posada, Mara; McKinney, Sheila; Limon-		litigation strategy and prepared in anticipation of

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PRIV-002340	4/21/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002369	3/26/2020	Barraza, Polin	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Posada, Mara; McKinney, Sheila; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002373	4/20/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu; Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002374	4/20/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential draft document attached to email and containing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002375	4/17/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002392	3/31/2020	Hons, Jeffrey	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq., Hannah Swanson, Esq., Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

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PRIV-002394	3/30/2020	Jeffrey Hons	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Polin Barraza; Mara Posada; McKinney, Sheila; Dyana Limon- Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julia*; Swanson, Hannah*	Confidential email requesting legal advice from inhouse counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002395	3/30/2020	Linton, Melaney	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Confidential email attached to email and sent for the purpose of obtaining legal advice from in-house counsel Jennifer Sandman, Esq., Bethany Sousa, Esq., and Kristin Flood, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002396	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Polin Barraza; Posada, Mara; McKinney, Sheila; Dyana Limon- Mercado; Wiens- Talbert, Angle; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Confidential email requesting legal advice from inhouse counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.